

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO ALL CASES

MDL No. 2327

Motion Applicable to all cases
in MDL Nos. 2187, 2325, 2326,
2327 and 2387

**JOINT MOTION FOR ORDER TO SHOW CAUSE APPLICABLE TO ALL CASES
WHY THE COURT SHOULD NOT ENTER STIPULATED ORDER DISMISSING
CERTAIN DEFENDANTS FROM ALL CASES WITHOUT PREJUDICE**

Co-Lead Counsel for Plaintiffs and Endo Health Solutions Inc. (“Endo Health”), Endo Pharmaceuticals Inc. (“Endo Pharmaceuticals”), American Medical Systems Holdings, Inc. (“AMS Holdings”) (hereinafter collectively “Endo Entities”), and Defendant American Medical Systems, Inc. (“AMS”) (collectively, “Defendants”), respectfully request that the Court issue an Order to Show Cause why the Court should not enter an Order dismissing the Endo Entities from all cases filed in MDL Nos. 2187, 2325, 2326, 2327, and 2387 without prejudice as set forth in the proposed Order attached hereto as **Exhibit A**. Entry of the proposed Order will moot the dispute presently before this Court as set forth in Docket #253; Docket #254; and Docket #272.

Following extensive, direct, and, at times, in-person negotiations between Co-Lead Counsel for Plaintiffs and Lead Counsel for Defendants over the course of several weeks, the parties reached an agreement on the language of the proposed Order. At the December 6, 2012 status conference, the parties informed the Court that they had reached an agreement as to the language of the proposed Order. The Court then instructed the parties to file the instant motion.

For the foregoing reasons, Co-Lead Counsel for Plaintiffs and Defendants respectfully request that the Court enter the Order attached hereto as Exhibit A.

Dated: January 8, 2012

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***Attorneys for the Defendant American Medical
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CERTIFICATE OF SERVICE

I hereby certify that on January 8, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Barbara R. Binis